

**STATEMENT OF BASIS (AI No. 11067)**

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0124052 to discharge to waters of the State of Louisiana.

**THE APPLICANT IS:** The Cross Group, Inc.  
CROSSMAR  
P.O. Box 3799  
Houma, LA 70361

**ISSUING OFFICE:** Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313

**PREPARED BY:** Yvonne Baker

**DATE PREPARED:** August 11, 2008

**1. PERMIT STATUS****A. Reason For Permit Action:**

Issuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

**B. NPDES permit –** NPDES permit effective date: N/A  
NPDES permit expiration date: N/A  
EPA has not retained enforcement authority.

**C. LPDES permits –** LAR05N991  
LPDES permit effective date: July 1, 2008  
LPDES permit expiration date: April 30, 2011

**D. Date Application Received:** June 18, 2008; additional information received July 9, 2008 via phone conversation. The facility submitted a Notice of Intent to discharge Sanitary Wastewater; however, the facility does not qualify for the Class I Treated Sanitary Wastewater General Permit because the general permit does not allow for discharges of exterior vehicle and equipment washwater. Therefore, an individual permit is being issued to cover their treated sanitary wastewater, exterior vehicle and equipment washwater, and industrial stormwater. Upon the effective date, the final permit will replace the previously issued MSGP permit (LAR05N991).

**2. FACILITY INFORMATION**

**A. FACILITY TYPE/ACTIVITY -** oilfield service company with an office, repair service, and yard

CROSSMAR is an oilfield service company which provides oil and gas field machinery, equipment, spare parts, and equipment repair services to the marine and oil industry. The equipment is stored on site and is cleaned by pressure washing. The facility discharges treated sanitary wastewater, exterior vehicle and equipment washwater, and industrial stormwater.

Statement of Basis for  
The Cross Group, Inc., CROSSMAR  
LA0124052, AI No. 11067  
Page 2

**B. FEE RATE**

1. Fee Rating Facility Type: minor
2. Complexity Type: II; BPJ to 0 points based on minimal flow from the facility and similar discharges
3. Wastewater Type: II
4. SIC code: 1389, 3533

**C. LOCATION** - 1950 South Van Avenue in Houma, Terrebonne Parish  
Latitude 29° 34' 30", Longitude 90° 42' 41"

**3. OUTFALL INFORMATION**

Outfall 001

Discharge Type: treated sanitary wastewater

Treatment: STP with chlorination

Location: at the point of discharge from the STP located by the office building prior to mixing with other waters

Flow: 500 GPD

Discharge Route: via pipe to local drainage thence into Bayou LaCarpe

Outfall 002

Discharge Type: treated sanitary wastewater

Treatment: STP with chlorination

Location: at the point of discharge from the STP located near the parking area prior to mixing with other waters

Flow: 500 GPD

Discharge Route: via pipe to local drainage thence into Bayou LaCarpe

Outfall 003

Discharge Type: exterior vehicle and equipment washwater

Treatment: none

Location: at the point of discharge from the washing activity prior to mixing with other waters

Flow: intermittent

Discharge Route: via local drainage thence into Bayou LaCarpe

**4. RECEIVING WATERS**

STREAM - via pipe and local drainage thence into Bayou LaCarpe

BASIN AND SEGMENT - Terrebonne Basin, Segment 120509

DESIGNATED USES -

- a. primary contact recreation
- b. secondary contact recreation
- c. propagation of fish and wildlife
- d. drinking water supply\*

Statement of Basis for  
The Cross Group, Inc., CROSSMAR  
LA0124052, AI No. 11067  
Page 3

\*Drinking Water Supply is listed as a designated use of Segment 120509 (Houma Navigation Canal-From Houma to Bayou Pelton). However, this designated use is applicable only if the discharge is directly into the named waterbody and not into a tributary or distributary of the waterbody, per LAC33:IX.1111.

## **5. TMDL STATUS**

Subsegment 120509, Houma Navigation Canal-From Houma to Bayou Pelton, is not listed on LDEQ's Final 2006 303(d) List as impaired, and to date no TMDL's have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

## **6. PROPOSED EFFLUENT LIMITS**

BASIS - See Rationale below.

## **7. COMPLIANCE HISTORY/COMMENTS**

A. OEC – There are no open, appealed, or pending OES enforcement actions as of July 14, 2008.

B. DMR Review/Excursions – N/A; initial permit

## **8. ENDANGERED SPECIES**

The receiving waterbody, Subsegment 120509 of the Terrebonne Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 24, 2007 from Boggs (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

## **9. HISTORIC SITES**

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

## **10. TENTATIVE DETERMINATION**

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

Statement of Basis for  
The Cross Group, Inc., CROSSMAR  
LA0124052, AI No. 11067  
Page 4

## **11. PUBLIC NOTICES**

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

Statement of Basis for  
The Cross Group, Inc., CROSSMAR  
LA0124052, AI No. 11067  
Page 5

### Rationale for The Cross Group, Inc.

#### 1. Outfall 001 - treated sanitary wastewater (estimated flow is 500 GPD)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg.: Wkly. Avg. (mg/l)	<u>Reference</u>
Flow (GPD):	---:Report	
BOD	---:45	Similar discharges* (BPJ), LAG530000
Fecal Coliform Colonies/100 ml	---:400 (daily max)	Similar discharges* (BPJ), LAG530000
TSS	---:45	Similar discharges* (BPJ), LAG530000
pH	6.0 - 9.0 su	Similar discharges* (BPJ), LAG530000

**Treatment:** mechanical treatment plant

**Monitoring Frequency:** Semiannually for all parameters at the point of discharge from the STP located by the office building prior to mixing with other waters.

**Limits Justification:** Limits and monitoring frequencies are based on current guidance for similar discharges from other industrial facilities and the Class I Sanitary General Permit, LAG530000 effective November 1, 2007.

#### 2. Outfall 002 - treated sanitary wastewater (estimated flow is 500 GPD)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg.: Wkly. Avg. (mg/l)	<u>Reference</u>
Flow (GPD)	---:Report	
BOD	---:45	Similar discharges* (BPJ), LAG530000
Fecal Coliform Colonies/100 ml	---:400 (daily max)	Similar discharges* (BPJ), LAG530000
TSS	---:45	Similar discharges* (BPJ), LAG530000
pH	6.0 - 9.0 su	Similar discharges* (BPJ), LAG530000

**Treatment:** mechanical treatment plant

**Monitoring Frequency:** Semiannually for all parameters at the point of discharge from the STP located near the parking area prior to mixing with other waters.

**Limits Justification:** Limits and monitoring frequencies are based on current guidance for similar discharges from other industrial facilities and the Class I Sanitary General Permit, LAG530000 effective November 1, 2007.

Statement of Basis for  
 The Cross Group, Inc., CROSSMAR  
 LA0124052, AI No. 11067  
 Page 6

3. **Outfall 003** – exterior vehicle and equipment washwater (estimated flow is intermittent)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg: Daily Max (mg/L)	<u>Reference</u>
Flow (GPD)	Report: Report	
TSS	---:45	Similar discharges * (BPJ), LAG480000
COD	200: 300	Similar discharges * (BPJ), LAG480000
Oil and Grease	---:15	Similar discharges * (BPJ), LAG480000
pH	6.0 - 9.0 su	Similar discharges * (BPJ), LAG480000
Oil and Grease, Visual	---: No Presence	Similar discharges * (BPJ), LAG480000
Soaps and Detergents	Inventory Record: ---	Similar discharges * (BPJ), LAG480000

**Treatment:** rock bed filter

**Monitoring Frequency:** daily for oil and grease, visual and quarterly for flow, TSS, COD, oil and grease, and pH at the point of discharge from the washing activity prior to mixing with waters of the state. Soaps and Detergents: document in a quarterly inventory record the quantity and type of any Soap and/or Detergent used during each calendar month.

**Limits Justification:** Limits and monitoring frequencies are based on current guidance for similar discharges from other facilities and the Light Commercial General Permit, LAG480000 effective August 1, 2001.

Note: EPA Guidelines for Metal Products & Machinery (40 CFR Part 438) are applicable; however, more stringent state requirements for exterior equipment washwater are being placed in the permit.

\* Existing permits for similar outfalls  
 su Standard Units

**NOTE**

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

**STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT**

A SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water discharges shall not be required to obtain an LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.a-k, facilities classified as SIC code 1389, 3533 are considered to have storm water discharges associated with industrial activity.

The SWP3 shall be prepared, implemented, and maintained within (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in the storm water discharges associated with industrial activity at the facility (see Narrative Requirements for the AI).